

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN ANDERJASKA, CHUNGYAO  
CHEN, TEENA COLEBROOK, JOEL  
GRIFFITH, ART HEINEMAN, CALVIN  
WILLIAMS, CHARLES WITTE, on behalf  
of themselves and all others similarly  
situated,

Plaintiffs,

v.

BANK OF AMERICA, N.A., CAPITAL ONE,  
N.A., CITIBANK, N.A., J.P. MORGAN  
CHASE, N.A., WELLS FARGO BANK, N.A.,

Defendants.

Civil Action No. 1:19-cv-3057-LTS-GWG

**NOTICE OF DEFENDANT BANK OF AMERICA, N.A.'S  
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that the undersigned attorneys for Defendant Bank of America, N.A. ("BANA") in the above-referenced matter will move this Court, before the Honorable Laura Taylor Swain, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be determined by this Court for an order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, dismissing with prejudice, the claims asserted in the Complaint.

The grounds for this motion are that there is no basis for an exercise of general or specific personal jurisdiction over BANA. The specific grounds for this motion are set forth in the accompanying Memorandum of Law of Defendant Bank of America, N.A. in Support of Its Motion to Dismiss for Lack of Personal Jurisdiction.

Prior to filing this motion, BANA used its best efforts to resolve the matters in controversy. BANA provided counsel for Plaintiffs with a letter setting forth the anticipated grounds for the instant motion and the parties met and conferred regarding the motion by telephone.

Dated: New York, New York  
May 14, 2020

Respectfully submitted,

/s/ Gabrielle L. Gould  
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